

**FORM 10**  
**APPLICATION FOR ACCESS TO INFORMATION UNDER**  
**PROTECTIVE ORDER BY EXPERT CONSULTANT OR WITNESS**

**United States Court of Federal Claims**

\_\_\_\_\_  
AMAZON WEB SERVICES, INC. , )  
Plaintiff, ) No. 19-1796C  
v. ) Judge Campbell-Smith  
THE UNITED STATES, )  
Defendant. )

**APPLICATION FOR ACCESS TO INFORMATION UNDER**  
**PROTECTIVE ORDER BY EXPERT CONSULTANT OR WITNESS**

1. I, the undersigned, am a Advisor/Consultant with Unaffiliated (Self-Employed) and hereby apply for access to protected information covered by the Protective Order issued in connection with this proceeding.

2. I have been retained by Morrison & Foerster LLP and will, under the direction and control of Kevin P. Mullen, assist in the representation of Amazon Web Services, Inc. in this proceeding.

3. I hereby certify that I am not involved in competitive decision making as discussed in *U.S. Steel Corp. v. United States*, 730 F.2d 1465 (Fed. Cir. 1984), for or on behalf of any party to this proceeding or any other firm that might gain a competitive advantage from access to the information disclosed under the protective order. Neither I nor my employer provides advice or participates in any decisions of such parties in matters involving similar or corresponding information about a competitor. This means, for example, that neither I nor my employer provides advice concerning, or participates in decisions about, marketing or advertising strategies, product research and development, product design or competitive structuring and composition of bids, offers, or proposals with respect to which the use of protected information could provide a competitive advantage.

4. My professional relationship with the party for whom I am retained in this proceeding and its personnel is strictly as a consultant on issues relevant to the proceeding. Neither I nor any member of my immediate family holds office or a management position in any company that is a party in this proceeding or in any competitor or potential competitor of a party.

5. I have attached the following information:

- a. a current resume describing my education and employment experience to date;
- b. a list of all clients for whom I have performed work within the two years prior to the date of this application and a brief description of the work performed;
- c. a statement of the services I am expected to perform in connection with this proceeding;

- d. a description of the financial interests that I, my spouse, and/or my family has in any entity that is an interested party in this proceeding or whose protected information will be reviewed; if none, I have so stated;
- e. a list identifying by name of forum, case number, date, and circumstances all instances in which I have been granted admission or been denied admission to a protective order, had a protective order admission revoked, or have been found to have violated a protective order issued by an administrative or judicial tribunal; if none, I have so stated; and
- f. a list of the professional associations to which I belong, including my identification numbers.

6. I have read a copy of the Protective Order issued by the court in this proceeding. I will comply in all respects with all terms and conditions of that order in handling any protected information produced in connection with the proceeding. I will not disclose any protected information to any individual who has not been admitted under the Protective Order by the court.

7. For a period of two years after the date this application is granted, I will not engage or assist in the preparation of a proposal to be submitted to any agency of the United States government for Enterprise Infrastructure Cloud when I know or have reason to know that any party to this proceeding, or any successor entity, will be a competitor, subcontractor, or teaming member.

8. For a period of two years after the date this application is granted, I will not engage or assist in the preparation of a proposal or submission to Washington Information Services nor will I have any personal involvement in any such activity.

9. I acknowledge that a violation of the terms of the Protective Order may result in the imposition of such sanctions as may be deemed appropriate by the court and in possible civil and criminal liability.

\* \* \*

By my signature, I certify that, to the best of my knowledge, the representations set forth above (including attached statements) are true and correct.

  
Signature

Steven D. Talt, Jr.

Typed Name and Title

(206)227-9487

Telephone Number

steve.talt@comcast.net

E-mail Address

1-14-2020

Date Executed

  
Signature of Attorney of Record

Kevin P. Mullen, Partner

January 15, 2020

Date Executed

Typed Name and Title

(202) 887-1560

Telephone Number

kmullen@mofa.com

E-mail Address

**Response to 5(a):**

**Steven D. Talt Jr.**  
 3138 130<sup>th</sup> Ave NE, Bellevue, WA 98005  
[steve.talt@comcast.net](mailto:steve.talt@comcast.net)  
 Cell – 206.227.9487

**SUMMARY**

Visionary IT executive with demonstrated ability to deliver, support, and maintain highly available technical solutions that meet business needs. Has a firm balance between business and technology acumen. Adept in problem-solving, crisis management, and vendor management. Experienced at managing both in-sourced and out-sourced staffing models.

**ACCOMPLISHMENTS**

- Created business case and drove execution of an all-in cloud migration. The 134 applications (2,200 instances and 20PB of Object Storage) were migrated within 16 months and \$2MM under budget.
- Successfully directed a \$56MM operational budget and led projects with budgets up to \$16.6MM
- Led teams as large as 50 internal and 200+ managed services technical resources
- Implemented Private Cloud providing IaaS capability for Windows, Linux, and AIX compute enabling self-serve virtual system provisioning
- Managed operational support for as many as 8300+ Windows servers, 4000+ Linux Servers, 3500+ Unix Servers, and 400+ VMWare ESXi hosts, 50,000+ Windows workstations
- Provided oversight for world-class data centers (Over 108,000 SQFT of Raised floor)
- Created and managed a shared enterprise virtual infrastructure service. Saved over \$14MM in hardware and support costs.
- Reduced Windows server deployment time by 88% leveraging automation and process improvement
- Increased server utilization from ~10% to over 65% in an environment of 8300+ servers by driving virtualization initiatives

**RELEVANT EXPERIENCE****GETTY IMAGES, Seattle, WA***Dec. 2013 – Present***Senior Director – Platform Engineering and Operations**, Seattle, WA, 12/13 – Present

- Oversee Server, Storage, Network, Data Center, Cloud, DevOps, Automation engineering and operations
- Lead team as large as 43 engineers, product owners, and managers split between Seattle and Calgary
- Designed, deployed, and operated Openstack based private cloud
- Managed 400+ VMWare Hosts supporting 6,400+ Linux and Windows virtual servers, another 2,500+ physical hosts, and an AWS deployment with 400+ EC2 instances and numerous other services
- Support and maintain CI/CD pipeline toolsets including: Packer, Jenkins, Gitlab, Gitlab CI, Artifactory, and Puppet Enterprise
- Created a successful business case to migrate nearly all Getty applications into AWS
- Directed AWS governance program and migration plan
- Developed monitoring and automation platform to support and manage the private cloud environment
- Created Self-Service portal to enable developers to build their own environments eliminating a key bottleneck for delivery of new services
- Engineer and operate over 30PB of object, block, and file based storage
- Managed an international network connecting 40+ office locations and 3 datacenters
- Control \$24MM annual capital and operational expense budgets

**T-MOBILE, Bothell, WA***Jul. 2011 – Dec. 2013***Senior Manager – Platform Design and Tooling**, Bothell, WA, 7/11 – 12/13

- Set technical direction for Server, Client, Storage, Automation, and Tooling solutions
- Manage a team as large as 4 managers, 35 individual contributors and 14 contractors

- Led team that developed and private cloud solution that provided self service capabilities for Windows, Linux, and AIX servers
- Built Availability Dashboards for critical applications and related resources (servers, network, and DBs)
- Provide escalated incident support and problem ownership for owned technologies
- Worked with development partners to design solutions for Amazon EC2 based project
- Developed DevOps/Continuous deployment strategy with development partners
- Manage day-to-day operations of 3,500 AIX, HP-UX, OEL, and Solaris servers
- Developed AIX Capacity Planning Model and LPAR migration strategy to even work load across frames

***WASHINGTON MUTUAL / JP MORGAN CHASE***

***Oct. 2003 – Jul 2011***

**Technical Director, Retail Production Assurance Center, Columbus, OH, 3/09 – 7/11**

- Oversee Incident Management, Problem Management and Change Management for the systems supporting the more than five thousand branches, fifteen thousand ATMs, five thousand Call Center seats in four countries, and Lending (Auto, Education, and Home) operations.
- Developed resource strategy leveraging captive offshore resources to provide “Follow the Sun” coverage
- Deployed automation and workflow management to improve efficiency and effectiveness of the team
- Created and chair Root Cause Review board to accelerate problem management maturity
- Built suite of actionable reports for management team to reduce change failure, improve change planning, identify incident trends, and eliminate high impact problems

**Vice President/Technology Group Manager, Production Support, Seattle, WA, 1/04 – 3/09**

- Responsibilities included server and workstation hardware and OS certification, group policy, server virtualization, and enterprise file services, server and client operations, Service Desk, Incident and Problem Management, Software Delivery, Executive Support, and Data Center management
- Managed operational support for over 8300+ Windows servers, 1500+ Unix Servers, and 150+ VMWare ESX servers, 50,000+ Windows workstations
- Oversight for two world-class data centers (Over 108,000 SQFT of Raised floor)
- Set the technical direction for Windows, Unix, and Virtualization platforms
- Created and managed a shared enterprise virtual infrastructure service: 837 virtual servers and 2500 virtual workstations deployed. Saved over \$14MM in hardware and support costs.

**Technical Program Manager, Infrastructure PMO, Seattle, WA, 1/03 – 1/04**

- Led the Infrastructure effort to move the online banking environment onto a new computing platform
- Built two new network modules and 284 servers in three different data centers
- Managed a 45-member cross department team and a \$16.6M budget

***eCASH TECHNOLOGIES, Bothell, WA***

***Aug. 2000 – Mar. 2002***

**Director of IT Operations**

- Directed System Administration, Configuration Management, Release Management, Customer Support, Information Security, Crisis Management, HW/SW Support, HW/SW Purchasing, Network Configuration and Management, Production Control, Technical Documentation, Training functions
- Responsible for 24X7X365 support of an Internet-Based Processing Environment; Maintained 99.999% uptime for the production environment
- Served as Technical Liaison with prospective customers. Provided pre-sales support, defined minimum system requirements, designed and supervised implementations.

***IMPERIAL BANK, Manhattan Beach, CA***

***Jul. 1998 – Aug. 2000***

**Vice President/Production Services Manager**

- Responsible for Computer Operations, the Network Operation Center, Configuration Management, IT Standards and Security, and Production Control groups
- Simultaneously managed the remodeling of the Primary Data Center and construction of a new site
- Created and enforced security policies and instituted a Incident Response Team to manage virus outbreaks and other computer-based attacks
- Documented and coordinated testing of the Technology Disaster Recovery Plan
- Designed an Internet Firewall Infrastructure and migrated seven Web Sites into the framework
- Selected and implemented a web based single sign-on/portal product

#### OTHER EXPERIENCE

<b><i>VOLT INFORMATION SCIENCES Inc. (Microsoft), Redmond, WA</i></b>	<i>Mar. 2002 – Nov. 2002</i>
Business Systems Analyst III	
<b><i>ARTHUR ANDERSEN L.L.P, Portland, OR</i></b>	<i>Oct. 1997 – Jul. 1998</i>
Senior Consultant	
<b><i>COOPERS AND LYBRAND L.L.P, Portland, OR</i></b>	<i>May 1997 – Oct. 1997</i>
Computer Assurance Services Associate	
<b><i>U.S. Bancorp, Portland, OR</i></b>	<i>Nov. 1995 – May 1997</i>
Information Technology Auditor	
<b><i>ASSOCIATED MARKETING RESOURCES, Beaverton, OR</i></b>	<i>Dec. 1993 – Nov. 1995</i>
Director of Operations	

#### EDUCATION

B.S. in Business Administration- Information Systems, Portland State University, Portland, Oregon -1993

#### CERTIFICATIONS

AWS Certified Solutions Architect - Associate  
ITIL Foundation - Certified Information Systems Auditor (Lapsed)

**Response to 5(b):**

**LIST OF CLIENTS**

- Presently, and during the previous two years, I have had no clients, other than AWS for this engagement.
- My employer, Getty Images (US), Inc. sells digital images to the general public on a commercial retail basis. I direct a team providing Cloud Operations, Engineering, and Governance for this media company. However, Getty Images will not be involved in my activity as an independent outside consultant in this protest. I will neither use Getty Images resources nor share with anyone outside the Protective Order (Getty Images or anyone else) the protected information to which I obtain access during the protest process.

**Response to 5(c):**

**STATEMENT OF SERVICES TO BE PERFORMED**

I will assist counsel for Amazon Web Services, Inc. by providing analyses on technical and pricing issues relating to the protest. I will review and advise on related information, including, but not limited to, relevant filings submitted to the Court.

**Response to 5(d):**

**DESCRIPTION OF FINANCIAL INTERESTS**

NONE.

**Response to 5(e):**

**PRIOR PROTECTIVE ORDERS**

NONE.

**Response to 5(f):**

**LIST OF PROFESSIONAL ASSOCIATIONS**

NONE.